

228-316

7/27/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

George Meindl
Nufarm Americas Inc.
11901 S. Austin Avenue
Alsip, IL 60803

JUL 22 2013

Subject: Notification; Per PR-Notice 98-10
Turflon II Amine
EPA Reg. No. 228-316
Date Submitted: July 18, 2013

Dear Mr. Meindl:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated July 18, 2013 for the product referenced above. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions regarding this letter, please contact Kable Bo Davis at (703) 306-0415 or davis.kable@epa.gov.

Sincerely,


Kathryn Montague
Product Manager 23
Herbicide Branch
Registration Division (7505P)



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 228-316	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Turflon II Amine	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Nufarm Americas, Inc. 11901 S. Austin Avenue Alsip, IL 60803 <input checked="" type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	NOTIFICATION JUL 22 2013
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Label notification (adding a weed - purple loosestrife) consistent with PRN98-10, see cover letter for detailed explanation. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make false statements to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name George Meindl george.meindl@us.nufarm.com	Title Sr. Regulatory Affairs Manager	Telephone No. (Include Area Code) 708.377.1423
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received: (Stamped)
2. Signature 	3. Title Sr. Regulatory Affairs Manager	
4. Typed Name George Meindl	5. Date 7/18/2013	



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Nufarm Americas, Inc.
George Meindl
Sr. Regulatory Affairs Manager
 11901 South Austin Avenue
 Alsip, IL 60803
 Phone: 708.377.1423 Fax: 708.377.1425
 george.meindl@us.nufarm.com

July 18, 2013

Via Overnight Courier

Kathryn Montague (PM-23)
 Document Processing Desk (NOTIF)
 Office of Pesticide Programs (7504P)
 U. S. Environmental Protection Agency
 Room S4900, One Potomac Yard
 2777 S. Crystal Drive
 Arlington, VA 22202

Subject: Turflon II Amine
 EPA Reg. No. 228-316
 Label Notification – adding a weed

Dear Ms. Montague:

Nufarm Americas Inc. would like to add purple loosestrife as a weed this product can control. We feel that this label change is permitted and consistent with PRN98-10 section II (Labeling notifications) part B (Adding or Deleting Pests). We have added this weed to an existing site and existing dosage rate already on the product. With this submission we have also updated the label showing our new address.

To process this request please find enclosed the following:

- Application for Pesticide Registration (EPA form 8570-1)
- Revised labeling with areas of change clearly identified (1 copy)
- Revised labeling – clean (1 copy)
- Certification with Respect to Label Integrity
- CD containing the proposed labeling, file name: 000228-00316.20130715.adding purple loosestrife.pdf

If you should have any questions regarding this matter, please feel free to contact me at 708.377.1423 or email at george.meindl@us.nufarm.com.

Sincerely

George Meindl
 Sr. Regulatory Affairs Manager
 Nufarm Americas, Inc.

highlighted 4/15
see pgs 1, 5

TURFLON® II AMINE

NOTIFICATION
JUL 22 2013

[Alternate Brand Names: Aquasweep]

FOR THE CONTROL OF UNWANTED TREES AND BRUSH, AS WELL AS ANNUAL AND PERENNIAL BROADLEAF WEEDS ON RANGELAND, PASTURES, FENCEROWS, NON-IRRIGATION DITCHBANKS, ROADSIDES, OTHER NON-CROP AREAS, RIGHTS-OF-WAY, ORNAMENTAL TURF, GOLF COURSES AND SOD FARMS.

FOR THE CONTROL OF EMERGENT, FLOATING AND SUBMERGED AQUATIC WEEDS IN THE FOLLOWING AQUATIC SITES: PONDS, LAKES, RESERVOIRS, MARSHES, BAYOUS, NON-IRRIGATION CANALS AND DITCHES, SEASONAL IRRIGATION CANALS AND DITCHES WHICH HAVE LITTLE OR NO CONTINUOUS OUTFLOW AND IMPOUNDED RIVERS AND STREAMS THAT ARE QUIESCENT OR SLOW MOVING.

ACTIVE INGREDIENTS:

2,4-Dichlorophenoxyacetic Acid, Dimethylamine salt* 34.2%

Triclopyr: 3,5,6-trichloro-2-pyridinyloxyacetic acid** 15.2%

as the triethylamine salt 50.6%

OTHER INGREDIENTS:

TOTAL: 100.0%

Isomer Specific Method, Equivalent to:

*2,4-Dichlorophenoxyacetic Acid 28.4%, 2.78 lbs./gal.

**Triclopyr acid 10.9%, 1.07 lbs./gal.

Notice: Read the entire label. Use only according to label directions.
Before buying or using this product, read "Warranty" elsewhere on this label.

KEEP OUT OF REACH OF CHILDREN

DANGER / PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

SEE INSIDE BOOKLET FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1840

EPA REG. NO. 228-316
EPA EST. NO. 228-IL-1

Manufactured For
NUFARM AMERICAS INC.
11901 S. Austin Avenue
Alsip, IL 60803



NET CONTENTS: _____ Gals. (_____ L)

000228-00316.20130715.adding purple loosestrife



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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER / PELIGRO**

Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin. Harmful if swallowed. Do not get in eyes, on skin, or on clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Some materials that are chemical-resistant to this product are made of any waterproof material. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

Pilots must wear:

- long-sleeved shirt and long pants, and
- shoes and socks

All mixers, loaders, flaggers, and other applicators and handlers must wear:

- protective eyewear (goggles or face shield or shielded safety glasses),
- long sleeved shirt and long pants,
- shoes plus socks, and
- chemical-resistant gloves made of any waterproof material

See engineering controls for additional requirements.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Control Statement:

Pilots must use an enclosed cockpit that meets the requirements listed in the WPS for agricultural pesticides. [40 CFR 170.240(d)(6)].

USER SAFETY RECOMMENDATIONS	
Users Should:	
<ul style="list-style-type: none"> • Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. • Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. If pesticide gets on skin, wash immediately with soap and water. • Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing. 	

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.

HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.	

NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate use of gastric lavage.	

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates. For terrestrial uses, do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

Triclopyr has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable particularly where the water table is shallow, may result in groundwater contamination.

Mixing and Loading: Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

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SPRAY DRIFT MANAGEMENT

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of application (e.g., ground, aerial, airblast) can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

Droplet Size

When applying sprays that contain 2,4-D as the sole active ingredient, or when applying sprays that contain 2,4-D mixed with active ingredients that require a Coarse or coarser spray, apply only as a Coarse or coarser spray (ASAE standard 572) or a volume mean diameter of 385 microns or greater for spinning atomizer nozzles.

When applying sprays that contain 2,4-D mixed with other active ingredients that require a Medium or more fine spray, apply only as a Medium or coarser spray (ASAE standard 572) or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Wind Speed

Do not apply at wind speeds greater than 15 mph. Only apply this product if the wind direction favors on-target deposition and there are not sensitive areas (including, but not limited to, residential areas, bodies of water, known habitat for nontarget species, nontarget crops) within 250 feet downwind. If applying a Medium spray, leave one swath unsprayed at the downwind edge of the treated field.

Temperature Inversions

If applying at wind speeds less than 3 mph, the applicator must determine if: a) conditions of temperature inversion exist, or b) stable atmospheric conditions exist at or below nozzle height. Do not make applications into areas of temperature inversions or stable atmospheric conditions.

Susceptible Plants

Do not apply under circumstances where spray drift may occur to food, forage, or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables, or tobacco. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants.

Other State and Local Requirements

Applicators must follow all state and local pesticide drift requirements regarding application of 2,4-D herbicides. Where states have more stringent regulations, they must be observed.

Equipment

All aerial and ground application equipment must be properly maintained and calibrated using appropriate carriers or surrogates.

For aerial application:

The boom length must not exceed 75% of the wingspan or 90% of the rotor blade diameter.

Release spray at the lowest height consistent with efficacy and flight safety. Do not release spray at a height greater than 10 feet above the crop canopy unless a greater height is required for aircraft safety. This requirement does not apply to forestry or rights-of-way applications.

When applications are made with a crosswind, the swath will be displaced downwind. The applicator must compensate for this by adjusting the path of the aircraft upwind.

For ground boom application:

Do not apply with a nozzle height greater than 4 feet above the crop canopy.

APPLICATION INSTRUCTIONS

FOR PASTURE AND RANGELAND

For susceptible annual and biannual broadleaf weeds: Do not apply more than 2-3/4 pints of this product (1.0 lbs of 2,4-D ae) per acre per application.

Easy-To-Control Species: 3 pints/acre broadcast application or 1 to 1.5% solutions for high-volume foliar applications.

Alder	<i>Ceanothus</i> spp.	Maples (except bigleaf and vine*)	Sumac
Ash	Cherry (except black)	Multiflora Rose	Sycamore
Beech	Cottonwood	Poison Ivy	Tamarack
Birch	Dogwood	Poison Oak	Wax Myrtle (top growth)
Blackberry	Elderberry	Sassafras (top growth)	White Oak
Black Locust	Hawthorn	Scotch broom	Wild Grape
Boneset	Honeysuckle		Willow
Cascara			

*basal or dormant stem application only

For moderately susceptible biennial and perennial broadleaf weeds, difficult to control weeds and woody plants: Do not apply more than 5-1/2 pints of this product (2.0 lbs of 2,4-D ae) per acre per application.

Harder-To-Control Species: High-volume applications, 1.5% solution, conventional basal or dormant stem applications are recommended.

Buckbrush (<i>Symphoricarpos</i> spp.) (suppression)	Hazel	Salmonberry (suppression)
Common Persimmon (suppression)	Honeylocust (suppression)	Sweetgum
Elm (except winged elm)	Pine (suppression)	Trumpet creeper (suppression)
	Russian Olive	Virginia Creeper (suppression)

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PREPARING THE SPRAY

Add about one-half the desired amount of clean water to spray tank. Add this product and complete addition of water with agitation running. Mix thoroughly and continue moderate agitation while spraying.

Size of Sprayer (Gallons)	AMOUNT OF THIS PRODUCT REQUIRED FOR SPRAY MIXTURE		
	1% Solution	1.5% Solution	4% Solution
1	1-1/3 fluid ounces	2 fluid ounces	5-1/3 fluid ounces
3	4 fluid ounces	6 fluid ounces	1 pint
5	6-2/3 fluid ounces	10 fluid ounces	1-2/3 pints
20	2 quarts	3 quarts	2 gallons
100	1 gallon	1.5 gallons	4 gallons

APPLICATION INSTRUCTIONS

TURF

BROADCAST TREATMENT OF ORNAMENTAL TURF, GOLF COURSES AND SOD FARMS

Apply 1 to 2 quarts of this product in enough water to make 20 to 200 gallons total spray per acre to control broadleaf weeds growing in perennial bluegrass, tall fescue, or perennial ryegrass. Do not use on other grass species, such as bentgrass or St. Augustinegrass, unless injury can be tolerated. Apply from early spring through fall when weeds are actively growing. Broadleaf weed species germinate at different times. Only emerged weeds present at time of application are controlled. Additional applications should be made four weeks apart to minimize grass injury. Newly seeded turf should be mowed two or three times before being treated. Do not water for 24 hours after application. Do not reseed for 3 weeks after application.

SPOT TREATMENT OF ORNAMENTAL TURF, GOLF COURSES AND SOD FARMS USING PORTABLE SPRAYERS

Mix 1 to 2 fluid ounces of this product in enough water to make 3 gallons of spray (1 to 2 quarts per 100 gallons of spray) and apply at any time broadleaf weeds are susceptible by wetting foliage of undesirable plants to point of runoff.

Ornamental Turf and Sod Farm Restrictions

Limited to 2 applications per year with a 21-day minimum interval.

The maximum application rate for ornamental turf is 4-1/4 pints of this product (1.5 lbs of 2,4-D ae) per acre per application.

The maximum application rate for sod farm turf is 5-1/2 pints of this product (2 lbs of 2,4-D ae) per acre per application.

APPLICATION INSTRUCTIONS

FOR THE CONTROL OF EMERGENT, FLOATING AND SUBMERGED AQUATIC WEEDS IN THE FOLLOWING AQUATIC SITES: PONDS, LAKES, RESERVOIRS, MARSHES, BAYOUS, NON-IRRIGATION CANALS AND DITCHES, SEASONAL IRRIGATION CANALS AND DITCHES WHICH HAVE LITTLE OR NO CONTINUOUS OUTFLOW AND IMPOUNDED RIVERS AND STREAMS THAT ARE QUIESCENT OR SLOW MOVING.

SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of application (e.g., ground, aerial, airblast) can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

Do not apply under circumstances where spray drift may occur to food, forage or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage); ornamentals, sunflowers, tomatoes, beans, and other vegetables or tobacco. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants.

If applying at wind speeds less than 3 mph, the applicator must determine if a) conditions of temperature inversion exist or b) stable atmospheric conditions exist at or below nozzle height. Do not make applications into areas of temperature inversion or stable atmospheric conditions.

Applicators must follow all state and local pesticide drift requirements regarding application of 2,4-D and triclopyr herbicides. Where states have more stringent regulations, they must be observed.

USE RESTRICTIONS FOR AQUATIC AND WETLAND SITES

Notice to Applicators: Before application, coordination and approval of local and state authorities may be required, either by letter or agreement or issuance of special permits for aquatic applications.

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Use Requirements for Aquatic Areas:

When this product is applied to aquatic areas, follow PPE and reentry instructions in the "Non-Agricultural Use Requirements" section of this label.

Do not apply to salt water bays or estuaries.

Do not apply where runoff water may flow onto agricultural land as injury to crops may result.

Do not apply to unimpounded rivers and streams.

Do not apply to ditches or canals currently being used to transport irrigation water or that will be used for irrigation within 120 days following treatment or until triclopyr residue levels are determined to be 1.0 ppb triclopyr or less and 100 ppb 2,4-D or less.

RECREATIONAL USE OF WATER IN TREATMENT AREAS

There are no restrictions on the use of treated water for fishing. Do not swim in water treated with this product for (3) hours after treatment.

LIVESTOCK USE OF WATER FROM TREATMENT AREAS

There are no restrictions on consumption of treated water for potable use by livestock, pets or other animals.

CONTROL OF WEEDS AND BRUSH ON BANKS OF NON-IRRIGATION CANALS AND DITCHES

Application Rate

Apply 44 to 88 ounces of this product per acre to control annual weeds.

Apply 88 ounces of this product per acre for control of biennial and perennial weeds and susceptible woody plants.

Specific Use Directions

Apply using low pressure spray (10 to 40 psi) in a spray volume of 20 to 100 gallons per acre using power operated spray equipment.

Apply when wind speed is low, 5 mph or less.

Apply working upstream to avoid accidental concentration of spray into water. Cross-stream spraying to opposite banks is not permitted and avoid boom spraying over water surface. When spraying shoreline weeds, allow no more than 2 foot overspray onto water surface with an average of less than 1 foot of overspray to prevent significant water contamination.

Apply when weeds are small and growing actively before the bud stage. Apply when biennial and perennial species are in the seedling to rosette stage and before stalks appear. For hard to control weeds, a repeat application after 30 days at the same rate may be needed.

For woody species and patches of perennial weeds, mix 1 gallon of this product per 64 to 150 gallons of total spray. Wet foliage by applying about 3 to 4 gallons of spray per 1000 sq ft (10.5 x 10.5 steps).

Restrictions and Limitations

Do not apply more than 2 treatments per season or reapply within 30 days.

Use 2 or more gallons of spray solution per acre.

Do not apply more than 92 oz/acre (2.0 lb of 2,4-D acid equivalent) per application or more than 184 oz/acre (4.0 lb of 2,4-D acid equivalent) per use season.

Do not use on small canals with a flow rate less than 10 cubic feet per second (CFS) where water will be used for drinking purposes. CFS may be estimated by using the formula below. The approximate velocity needed for the calculation can be determined by observing the length of time that it takes a floating object to travel a defined distance. Divide the distance (ft.) by the time (sec.) to estimate velocity (ft. per sec.). Repeat 3 times and use the average to calculate CFS. Average Width (ft.) x Average Depth (ft.) x Average Velocity (ft. per sec.) = CFS

For ditchbank weeds, do not spray cross-stream to opposite bank. Do not allow boom spray to be directed onto water.

For shoreline weeds, boom spraying onto water surface must be held to a minimum and allow no more than 2 foot overspray onto water with an average of less than 1 foot overspray to prevent introduction of greater than negligible amounts of chemical into the water.

CONTROL OF EMERGENT AND FLOATING AQUATIC WEEDS:

Including Water Hyacinth (Eichomia crassipe) and Alligatorweed (Alternanthera philoxeroides)

SPECIFIC USE DIRECTIONS FOR EMERGENT AND FLOATING AQUATIC WEEDS

Application Sites

Ponds, Lakes, Reservoirs, Marshes, Bayous, Drainage Ditches, non-irrigation Canals, impounded Rivers and Streams that are Quiescent or Slow Moving, including Programs of the Tennessee Valley Authority.

Application Rate

Apply 88 to 175 oz of this product per acre.

Application Timing

Spray weed mass only. Apply when water hyacinth plants are actively growing. A second application may be made 21 days after the initial application to kill regrowth and plants missed in previous operation. Use 175 oz/acre rate when plants are mature or when weed mass is dense.

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Surface Application

Use power operated sprayers with boom or spray gun mounted on boat, tractor or truck. Thorough wetting of foliage is essential for maximum control. Use 100 to 400 gallons of spray mixture per acre. Special precautions such as use of low pressure, large nozzles and spray thickening agents should be taken to avoid spray drift to susceptible crops. Follow label directions for use of any drift control agent.

Aerial Application

Use drift control spray equipment or thickening agent mixed in the spray mixture. Apply 175 oz of this product per acre using standard boom systems using a minimum spray volume of 5 gallons per acre. For Microfoil (r) - drift control spray systems, apply this product in a total spray volume of 12 to 20 gallons per acre. Refer to the "Spray Drift Management" section.

Restrictions and Limitations for Surface Applications to Emergent Aquatic Weeds

Fish breathe dissolved oxygen in the water and decaying weeds also use oxygen. When treating continuous, dense weed masses, it may be appropriate to treat only part of the infestation at a time. For example, apply the product in lanes separated by untreated strips that can be treated after vegetation in treated lanes has disintegrated. During the growing season, weeds decompose in a 2 to 3 week period following treatment. Waters having limited and less dense weed infestations may not require partial treatments. Other local factors such as water exchange and sediment load can also influence the dissolved oxygen level. Coordination and approval of local and state authorities may be required, either by letter of agreement or issuance of special permits for aquatic applications.

Do not exceed 184 oz/acre (4.0 lb of acid equivalent) per surface acre per use season. Limited to 2 applications per season.

Do not make a broadcast application within 21 days of previous broadcast application. Spot treatments are permitted.

CONTROL OF SUBMERGED AQUATIC WEEDS: including Water Milfoil (*Myriophyllum spicatum*)

SPECIFIC USE DIRECTIONS FOR EMERGENT AND FLOATING AQUATIC WEEDS

Application Sites

Ponds, Lakes, Reservoirs, Marshes, Bayous, Drainage Ditches, non-irrigation Canals, impounded Rivers and Streams that are Quiescent or Slow Moving, Including Programs of the Tennessee Valley Authority.

Application Rate

Apply up to 3.88 gallons (10.8 lb of acid equivalent) per acre foot.

This product contains 2.78 lbs of 2,4-D acid equivalent and 1.07 lbs of triclopyr acid equivalent per gallon of product.

Application Timing

Apply in spring or early summer when aquatic weeds appear. Check for weed growth in areas heavily infested the previous year. A second application may be needed when weeds show signs of recovery, but no later than mid-August in most areas.

Surface Application

Use power operated boat mounted boom sprayer. If rate is less than 5 gallons per acre, dilute to a minimum spray volume of 5 gallons per surface acre.

Subsurface Application

Apply this product undiluted directly to the water through a boat mounted distribution system. Shoreline areas should be treated by subsurface injection application by boat to avoid aerial drift.

Apply to attain a concentration of 2 to 4 ppm 2,4-D and 0.75 to 1.5 ppm triclopyr (see table below).

Amount of 2,4-D and Triclopyr to Apply for a Target Subsurface Concentration					
2,4-D ac ppm	2	2.5	3	3.5	4
Triclopyr ac ppm	0.75	1.0	1.2	1.3	1.5
Avg Depth (ft)	This product gallons per surface acre at specified depth				
1	1.9	2.4	2.9	3.4	3.9
2	3.9	4.9	5.8	6.8	7.8
3	5.8	7.3	8.7	10.2	11.7
4	7.8	9.7	11.7	13.6	15.5
5	9.7	12.1	14.6	17.0	19.4

* For difficult conditions, for example, spot treatment of pioneer colonies of Eurasian Water Milfoil and certain difficult to control aquatic species.

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Aerial Application

Use drift control spray equipment or thickening agents mixed with sprays to reduce drift. Apply through standard boom systems in a minimum spray volume of 5 gallons per surface acre. For Microfoil (r) drift control spray systems, apply this product in a total spray volume of 12 to 20 gallons per acre. Refer to the "Spray Drift Management" section.

Restrictions and Limitations for Aquatic Sites with Submersed Weeds

Do not exceed 10.8 lbs. 2,4-D acid equivalent and 6.9 lbs triclopyr acid equivalent per acre foot.

Fish breathe oxygen in the water and a water-oxygen ratio must be maintained. Decaying weeds use up oxygen, but during the period when applications should be made, the weed mass is fairly sparse and the weed decomposition rate is slow enough that the water-oxygen ratio is not disturbed by treating the entire area at one time. If treatments must be applied later in the season when the weed mass is dense and repeat treatments are needed, apply product in lanes, leaving buffer strips which can then be treated when vegetation in treated lanes has disintegrated. During the growing season, weeds decompose in a 2 to 3 week period following treatment.

Do not apply within 21 days of previous application. Limited to 2 applications per season.

When treating slow moving bodies of water, applications must be made while traveling upstream to prevent concentration of 2,4-D and triclopyr downstream from the application.

WATER USE

Drinking water (potable water)

POTABLE WATER INTAKE SETBACKS FOR CONTROL OF SUBMERGED WEEDS – LAKES, RESERVOIRS, OR PONDS

Minimum setback distances from functioning potable water intakes for human consumption for the application of this product must be observed when controlling submerged weeds in lakes, reservoirs or ponds.

Drinking water setback distances do not apply to terrestrial applications made adjacent to water bodies with potable water intakes.

Existing potable water intakes that are no longer in use, such as those replaced by a connection to a municipal water system or a potable water well, are not considered to be functioning potable water intakes.

Consult with appropriate state or local water authorities before applying this product to public waters: State or local agencies may require permits. The potable water use restrictions on this label are to ensure that consumption of water by the public is allowed only when the concentration of triclopyr in water is less than 400 ppb and the concentration of 2,4-D in water is less than the MCL (Maximum Contaminant Level) of 70 ppb. Applicators should consider the unique characteristics of the treated waters to assure that the triclopyr and 2,4-D concentrations in potable water do not exceed 400 ppb and 70 ppb, respectively, at the time of consumption.

For submersed weed applications, the drinking water setback distances from functioning potable water intakes are provided in the following table.

Drinking water setback distance for submersed weed applications				
application concentration and minimum setback distance (ft) from functioning potable water table intake				
2,4-D ae/ppm	≤ 0.5	0.6 to 1	1.1 to 2	2.1 to 4
Triclopyr ae/ppm	≤ 0.2	0.2 to 0.4	0.5 to 0.7	0.8 to 1.5
Minimum Setback Distance (ft)	600	1200	1800	2400

If no setback distance from the above Drinking Water Setback Distance Table is to be used for the application, applicators or the authorizing organization must provide a drinking water notification and an advisory to shut off all potable water intakes prior to a 2,4-D application. Notification to the party responsible for a public water supply or to individual private water users must be done in a manner to assure that the party is aware of the water use restrictions when this product is applied to potable water.

The following is an example of a notification via posting, but other methods of notification which convey the above restrictions may be used and may be required in some cases under State or local law or as a condition of a permit.

Example: Posting notification should be located every 250 feet including the shoreline of the treated area and up to 250 feet of shoreline past the application site to include immediate public access points. Posting should include the day and time of application.

Posting may be removed if analysis of a water sample collected at the intake shows that the concentration of triclopyr in water is 400 ppb or less and the 2,4-D is 70 ppb or less, or after 21 days following application, whichever occurs first. Use the Sampling for Drinking Water Analysis After 2,4-D Application for Submersed Weed Applications Table below to determine the minimum numbers of days to wait between application and water sampling for a given application target concentration.

Text of notification: Wait 21 days before diverting functioning surface water intakes from the treated aquatic site to use as drinking water, unless water at functioning drinking water intakes is tested and is demonstrated by assay to contain triclopyr concentrations of 400 ppb or less and concentrations of 2,4-D of 70 ppb or less. Use the Sampling for Drinking Water Analysis After 2,4-D Application.

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for Submersed Weed Applications Table above to determine the minimum numbers of days to wait between application and water sampling for a given application target concentration.

Application Date: _____ Time: _____

Following each application of this product, treated water must not be used for drinking water unless one of the following restrictions has been observed:

- i. A setback distance described in the Drinking Water Setback Distance Table was used for the application, or
- ii. A waiting period of 21 days from the time of application has elapsed, or,
- iii. An approved assay indicates that the concentration of triclopyr is 400 ppb or less and the concentration of 2,4-D is 70 ppb or less at the water intake. Sampling for drinking water analysis should occur no sooner than stated in Sampling for Drinking Water Analysis After 2,4-D Application for Submersed Weed Applications Table above. Analysis of samples must be completed by a laboratory that is certified under the Safe Drinking Water Act to perform drinking water analysis using a currently approved version of analytical Method Number 515, 555, other methods for 2,4-D as may be listed in Title 40 CFR, Part 141.24, or Method Number 4015 (immunoassay of 2,4-D) from U.S. EPA Test Methods for Evaluating Solid Waste SW-846.

Except as stated above, there are no restrictions on using water from treated areas for fishing or watering livestock.

Coordination and approval of local and state authorities may be required, either by letter of agreement or issuance of special permits for aquatic applications.

Minimum days after application before initial water sampling at the functioning potable water intake			
2,4-D as ppm	≤ 0.5	0.6 to 2	2.1 to 4
Triclopyr as ppb	≤ 0.2	0.3 to 0.7	0.8 to 1.3
Minimum Days	5	10	14

Note: These are general guidelines; the amount of time required for residues to reach concentrations acceptable for drinking or irrigation will depend on the total acres treated relative to water body size, application rates, water exchange rates, weed density, and various other factors.

WATER USE Irrigation Purposes

Irrigation:

Do not use water treated with the product for irrigating greenhouse or nursery plants unless the triclopyr and 2,4-D residues are confirmed to be less than 1 ppb by laboratory analysis.

Do not use water treated with this product for irrigating hydroponic crops.

Do not apply under circumstances where spray drift may occur to food, forage or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables or tobacco. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants.

Do not use treated water for irrigation for 120 days following application or until residue levels are determined by laboratory analysis, or other appropriate means of analysis, to be 1.0 ppb triclopyr or less and 100 ppb 2,4-D or less.

There is no restriction on use of water from the treatment area to irrigate established grasses. Do not apply this product through any type of irrigation system.

Seasonal Irrigation Waters:

This product may be applied during the off-season to surface waters that are used for irrigation on a seasonal basis, provided that there is a minimum of 120 days between applying this product and the first use of treated water for irrigation purposes, or until residue levels are determined by laboratory analysis, or other appropriate means of analysis, to be 1.0 ppb triclopyr or less and 100 ppb 2,4-D or less.

Irrigation Canals/Ditches:

Do not apply this product to irrigation canals/ditches unless the 120 day restriction on irrigation water usage can be observed or residue levels are determined by laboratory analysis, or other appropriate means of analysis, to be 1.0 ppb triclopyr or less and 100 ppb 2,4-D or less.

Use of this product in certain portions of California, Oregon, and Washington is subject to the January 22, 2004 Order for injunctive relief in Washington Toxics Coalition et al vs. EPA, C01-0132C, (W.D. WA). For further information, please refer to EPA Web site: <http://www.epa.gov/espp>.

